

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF TENNESSEE  
CHATTANOOGA DIVISION**

**TERPSEHORE MARAS,**

**Plaintiff,**

**v.**

**REPRESENTATIVE STEVE COHEN, US  
DOMINION, INC., DOMINION VOTING  
SYSTEMS, INC., DOMINION VOTING  
SYSTEMS CORPORATION, MEDIA  
MATTERS FOR AMERICA and ALI  
ABDUL RAZAQ AKBAR A/KA/ ALI  
ALEXANDER,**

**Defendants.**

**Case. No. 1:21-cv-00317-DCLC-CHS**

**District Judge Clifton L. Corker**

**Magistrate Judge Christopher H. Steger**

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**PLAINTIFF TERPSEHORE MARAS' SUPPLEMENTAL BRIEF TO  
PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS  
IDENTIFIED IN NON-PARTY J. ALEXANDER HALDERMAN'S SUBPOENA**

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COMES NOW Plaintiff Terpsehore Maras and, by and through undersigned counsel and pursuant to LR7.01(d), hereby files Plaintiff Terpsehore Maras' Supplemental Brief to Plaintiff Terpsehore Maras' Supplemental Brief to Plaintiff's Motion to Compel Production of Documents Identified in Non-Party J. Alexander Halderman's Subpoena, and Plaintiff respectfully shows unto this Honorable Court the following:

**I.     THE HALDERMAN REPORT IS NECESSARY AS CORROBORATING  
EVIDENCE THAT WILL BE USED IN PLAINTIFF'S CASE IN CHIEF IN  
PROVING HER DEFAMATION CASE AGAINST THE DEFENDANTS.**

After Plaintiff filed her Motion to Compel Production of Documents Identified in Non-Party J. Alexander Halderman's Subpoena, new information was obtained regarding the apparent election fraud in the 2020 elections. The Plaintiff is a former private intelligence contractor, a whistleblower

and an investigative journalist seeking to remedy the damages to her reputation due to the statements of libel/defamation made by the Defendants. While Dr. J. Alexander Halderman's purported lawyer (David Cross) did not initially object to being counsel for Dr. Halderman, Mr. Cross now objects to being counsel for Dr. Halderman. *See* Exhibit A, E-mail Correspondence from David Cross. As such, Plaintiff's Certificate of Service will be updated to serving Dr. Halderman at his last known address.

As an investigative journalist, Plaintiff has confidential sources that have provided her with both the public seven page summary and a non-public unredacted twenty-four-page summary of the Halderman Report that she has obtained from sources that are protected, as they are privileged and confidential. *See* Exhibit B, September 21, 2021, Declaration of J. Alexander Halderman; *see* Exhibit C, August 2, 2021 Declaration of J. Alexander Halderman. As the court can see, both of Dr. Halderman's reports directly relate to matters contained in Plaintiff's Affidavit, which forms the basis and impetus of the Defendants' defamation. The Plaintiff presented evidence of election fraud in her affidavit and she now needs Dr. Halderman's full unredacted twenty-five-thousand-word report to use as corroborating evidence in proving her defamation case in chief against the Defendants.

Both of Dr. Halderman's election fraud declarations, which are summaries of his details reports and they are proof positive of election fraud, which expressly named the Dominion equipment. Dr. Halderman's Declarations show different perspectives and aspects of the severe vulnerabilities that demonstrate that the right to vote by citizens is unprotected when using Dominion Voting machines. In her Affidavit, Plaintiff testified that vulnerabilities from COTS (components off the shelf) as Shellshock<sup>1</sup> and patch management systems in place are still vulnerable to domestic and foreign hacking and it was made public. Thus far, Georgia's Center for Election Systems were found to have **not** had a patch in either 2016 or 2018. *See* Exhibit D, Georgia election systems could have

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<sup>1</sup> Shellshock is a vulnerability that allows systems containing a vulnerable version of Bash to be exploited to execute commands with higher privileges. This allows attackers to potentially take over that system.

been hacked before 2016 vote, <https://www.politico.com/news/2020/01/16/georgia-election-systems-could-have-been-hacked-before-2016-vote-100334> (last visited March 17, 2022).

In fact, Dr. Halderman's two Declarations regarding election fraud concur with Plaintiff's Affidavit and her testimony regarding the COTS (components off the shelf) vulnerabilities. Many states have ignored the patch vulnerabilities of COTS and many state and/or electronic voting systems remain unpatched and are compromised (knowingly or unknowingly), despite the repeated Department of Homeland Security alerts that were sent out to states. This compromise makes the states and/or electronic voting systems vulnerable to Shellshock, which means that the electronic voting machines are at a continuous state of vulnerability to domestic and/or foreign hacking. In addition, it is public knowledge that Georgia's Center for Election Systems were determined to be vulnerable from even before the 2016 elections, which concurs with Plaintiff's sworn testimony of ongoing long standing voting integrity concerns. *See* Exhibit D.

## **II. ARGUMENT AND CITATION OF AUTHORITY**

Pursuant to Local Rule 7.1(d),

**Supplemental Briefs.** No additional briefs, affidavits, or other papers in support of or in opposition to a motion shall be filed without prior approval of the Court, **except that a party may file a supplemental brief of no more than 5 pages to call to the Court's attention developments occurring after a party's final brief is filed.** Any response to a supplemental brief shall be filed within 7 days after service of the supplemental brief and shall be limited to no more than 5 pages.

Local Rule 7.1(d) (emphasis added).

In the case at bar, this Court should compel Dr. Halderman to produce his full and unredacted Report because it contains corroborating sworn testimony regarding election fraud that Plaintiff needs in order to prove her defamation case against the Defendants. Dr. Halderman's

Report on the election fraud is not privileged. Dr. Halderman's report is discoverable. Plaintiff needs this report as corroborating evidence in order to prove her election fraud case.

Respectfully submitted this *17th* day of March, 2022.

**THE NEWMAN LAW FIRM**

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**CERTIFICATE OF SERVICE**

I, Russell A. Newman, do hereby certify that I am counsel for Plaintiff Terpsehore Maras in the above-captioned matter and that a copy of the **PLAINTIFF TERPSEHORE MARAS' SUPPLEMENTAL BRIEF TO PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS IDENTIFIED IN NON-PARTY J. ALEXANDER HALDERMAN'S SUBPOENA** was filed and served via the CM/ECF system for the United States District Court, Eastern District of Tennessee, Chattanooga Division via electronic mail to the following CM/ECF filers:

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And via U.S. Mail on the following non-registered CM/ECF filers:

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Respectfully submitted this *17th* day of March, 2022.

**THE NEWMAN LAW FIRM**

By: /s/ Russell A. Newman  
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